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RON KENT HOOPER, AZ Bar # 1961

Attorney For Respondents INTERNATIONAL GLOBAL POSITIONS, LNG, COMMISSION JOHN J. MADSEN and MICHAEL J. COKER

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## BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS
MARK SPITZER, Chairmen,
JIM IRVIN
WILLIAM A. MUNDELL
JEFF HATCH-MILLER
MIKE GLEASON
KRISTIN K. MAYES

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ARIZONA CURPURATION COMMISSION HEARING DIVISION

In the matter of

INTERNATIONAL GLOBAL POSITIONS, INC., a Nevada Corporation, 720 Brazos St, Suite 500. Austin TX 78701

JOHN J. MADSEN 11801 W. HWY 71, Austin TX 78738

MICHAEL J. COKER 11801 W. HWY 71, Austin TX

JAMES W. DREOS, individually and dba DREOS FINANCIAL SERVICES,

EDMOND L. LONERGAN, and JANE DOE LONERGAN

CORPORATE ARCHITECTS, a Nevada corporation.

DOCKET NO S-03523A-03-000

MOTION TO EXTEND TIME
TO FILE AMENDED ANSWER
AND
PRELIMINARY ANSWER

Respondents INTERNATIONAL GLOBAL POSITIONS, INC., JOHN J. MADSEN and MICHAEL J. COKER, through Attorney Ron Kent Hooper, move the Commission for an extension to file an amended answer until January 5, 2004. Attorney Ron Kent Hooper is being retained just received the pleadings and needs until January 5, 2003 to become knowledgeable about the facts and issues.

To avoid a default, Attorney Ron Kent Hooper files the following preliminary Answer on behalf of Respondents from information just received.

#### **SECTION I JURISDICTION**

1. Admits the Arizona Corporation Commission has jurisdiction over acts that occurred in Arizona.

#### **SECTION II. RESPONDENTS**

- Answering paragraph 2, Deny IGP had offices in Scottsdale, AZ, Admit that IGP was incorporated on May 15, 2000 in Nevada and their address is 720 Brazos Street, Austin TX.
- 3. Answering paragraph 3, Admit that MADSEN had been director of Sales and Marketing of IGP, and lived at 15634 S. 6<sup>th</sup> Place, Phoenix, AZ, admit other addresses; Admit MADSEN entered into a plea agreement to plead guilty mail fraud and entered a plea in said case, but has not been sentenced or convicted thereof; said allegation is impertinent, scandalous and should be stricken.
- 4. Answering paragraph 4, Admit COKER was President and signed stock certificates; Respondents are without sufficient information to determine where he signed all certificates and therefore deny the same.
- 5. Answering paragraph 5, Admit DREOS was at all times a registered salesman and he was registered with AGSI; are without sufficient information to determine his residence.
- 6. Answering paragraph 6, Admit DREOS was registered as a securities salesman in association with or employed by Fox & Company Investments and his registration was suspended on or about the date of his termination; admit the Commission has authority to suspend or revoke his registration.
- 7. Answering paragraph 7, Admit DREOS was licensed with the Arizona Department of Insurance; Respondents are without sufficient information to determine the truth or the remaining allegations and deny the same.
- 8. Admit the allegations of paragraphs 8, 9, 11, 12, 14, 15, and 25.
- 9. Respondents are without sufficient to determine the truth of paragraphs 10, 13, and therefore deny the same.

### **SECTION III. FACTS**

- 10. Admit the allegations of paragraphs 16, 17, 18, 19.
- 11. Deny DREOS promised substantial potential profit for investors from trading IGP; these Respondents believed he was acting properly in compliance with the law and the placement memorandum; deny the remaining allegations of paragraphs 20 and 21 and 23.
- 12. Admit substantial investments were made; Respondents believed that investments were properly being made with accredited investors, are without sufficient information to determine the amount and therefore deny the same.
- 13. Deny the allegations of paragraphs 24, 26, 27, 28, 29, 30, 31, 32, 33.

### VIOLATIONS OF ARS § 44-1841 and 44-§1842

- 14. Admit Coker sold securities in Arizona which were not registered.
- 15. Deny the conduct of these Respondents violated ARS § 44-1841.
- 16. Deny MADSEN controlled IGP.
- 17. DENY the allegations of paragraph 38 and 39.
- 18. Answering paragraph 40 and 41, Deny these Respondents sold securities in Arizona; deny their conduct violates 44-§1842.

## **VIOLATIONS OF ARS § 44-1841**

19. Deny the allegations of paragraphs 42. 43 and 46.

# REMEDIES PURSUANT TO ARS 44-1962

- 20. Answering paragraphs 44 and 45, Deny Madsen or Lonergan controlled IGP.
- 21. Admit grounds exist to revoke or suspend DREOS registration; these Respondents are without sufficient information to determine the truth of the remaining allegations of paragraph 47 and deny the same.
- 22. Deny each and every part of each and every paragraph and allegation not expressly admitted herein.
- 23. Deny the Commission is entitled to the relief requested from these answering Respondents.
- 24. Respondents affirmatively request a hearing and the opportunity to be heard.

WHEREFORE Answering Respondents request that no relief be awarded against these Respondents.

Respectfully submitted: Thursday, December 22, 2003

RON KENT HOOPER, Attorney For Respondents INTERNATIONAL GLOBAL POSITIONS, INC., JOHN J. MADSEN and MICHAEL J. COKER 3420 East Shea, Suite 247, Phoenix, AZ 85028 Phone (602) 953-5267; Private Fax (602) 953-5269 RHooperAty@aol.com; AZ Bar # 1961

<u>Certificate of Service.</u> On September 22, 2003 a copy of the foregoing was: Faxed; E-Mailed; Mailed; or Delivered to:

PAMELA JOHNSON, Esquire Securities Division Arizona Corporation Commission 1300 West Washington, 3<sup>rd</sup> Floor Phoenix, AZ 85007

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